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Attorneys for Defendant,

COUNTY OF LOS ANGELES

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHELDON LOCKETT

Plaintiff

vs.

COUNTY OF LOS ANGELES, a
public entity; LOS ANGELES
COUNTY SHERIFF'S
DEPARTMENT; a law enforcement
agency; former SHERIFF JIM
MCDONNELL; MIZRAIN ORREGO,
a Deputy Los Angeles County Sheriff;
SAMUEL ALDAMA, a Deputy Los
Angeles County Sheriff; and DOES 1
through 100, inclusive,

Defendants.

CASE NO.: 2:18-cv-5838-PJW

**DECLARATION OF JACK F.
ALTURA**

DECLARATION OF JACK F. ALTURA

I, Jack F. Altura, declare as follows:

1. I am an attorney licensed to practice law in the State of California and admitted to this Court. I am an attorney at the law firm of Ivie McNeill Wyatt Purcell & Diggs, counsel of record for Defendant County of Los Angeles ("COLA").

- 1 2. I make the following declaration based upon my personal knowledge and if
2 asked to testify I could and would testify to the following facts.
- 3 3. On February 19, 2020, I took the oral deposition of Timothy Campbell at the
4 law office of Ivie McNeill Wyatt Purcell & Diggs. Mr. Campbell was
5 represented by Plaintiff's counsel.
- 6 4. Mr. Campbell left the deposition prior to me concluding it. Therefore, I
7 suspended the deposition with the understanding that I would resume the
8 deposition at a later date.
- 9 5. I have asked Plaintiff's counsel to produce Mr. Campbell for the second
10 session of his deposition on March 5, 2020, March 6, 2020, May 18, 2020,
11 June 5, 2020, and finally on June 18, 2020. Attached as Exhibit A is a true
12 and correct copies of my emails to Plaintiff's counsel requesting that they
13 produce Mr. Campbell.
- 14 6. Mr. Campbell has never been produced for the second session of his
15 deposition
- 16 7. A true and correct copy of portions of Plaintiff Sheldon Lockett's deposition
17 is attached is Exhibit B.
- 18 8. A true and correct copy of portions of Deputy Aldama's deposition in the
19 Taylor v. County of Los Angeles case is attached as Exhibit C.
- 20 9. A true and correct copy of portions of volume III of Deputy Aldama's
21 deposition in this case is attached as Exhibit D.
- 22 10. A true and correct copy of portions of the deposition of Plaintiff's tattoo
23 expert, Charles Shinn is attached as Exhibit E.
- 24 11. A true and correct copy of portions of the deposition of Neal Tyler is
25 attached as Exhibit F.
- 26 12. A true and correct copy of portions of Deputy Rogelio Bensor's deposition
27 is attached as Exhibit G.
- 28

13. A true and correct copy of the Watch Commander's Service Comment Report; and the Supervisor's Report on Use of Force is attached as Exhibit H
14. A true and correct copy of the Laboratory Examination Report (gunshot residue analysis) is attached as Exhibit I.
15. A true and correct copy of the Los Angeles County Sheriff's Department Crime Analysis Supplemental Form is attached as Exhibit J.
16. [REDACTED]
17. I am familiar with the allegations in the Taylor v. County of Los Angeles case. The incident in the Taylor case occurred on August 25, 2016.

I execute this declaration under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 7, 2020 at Los Angeles, California

/s/ Jack F. Altura
Jack F. Altura